

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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07 CIV 9385 (JFK)

SAMSARA INVESTMENT III, LLC.,

Plaintiff,

-against-

JERRY L. WALLACE,

Defendant,

-----X

DEFENDANT JERRY L. WALLACE'S INITIAL DISCLOSURES

Pursuant to Rule 26(a) (1) of the Federal Rules of Civil Procedure, Plaintiff Jerry L. Wallace ("Wallace") hereby submits his Initial Disclosures. In providing these disclosures, Wallace does not waive any objections that may be made regarding the production, use, or admissibility of the materials identified. To the extent further information relevant to these disclosures is obtained, Wallace will promptly provide the information to Plaintiff.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information.

Individuals likely to have discoverable information related to the plaintiff's causes of action and the Defendant's defenses and counterclaims are:

- (i) Rodney Bell
c/o Jerry Wallace Developments, LLC
151 Regions Way, Suite 6A
Destin, Florida 32541
(850) 837-0422

- (ii) Thomas Blackburn
c/o Jerry Wallace Developments, LLC
151 Regions Way, Suite 6A
Destin, Florida 32541
- (iii) John Haslett
- (iv) Mike O'Sullivan
- (v) Paul Wyant
c/o Jerry Wallace Developments, LLC
151 Regions Way, Suite 6A
Destin, Florida 32541
(850) 585-0993

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

- (i) the Investment Agreement dated February 23, 2006;
- (ii) the amended and restated Operating Agreement of Shores of Paradise, LLC dated February 24, 2006;
- (iii) the documents annexed to the Plaintiff's Complaint filed in this action; and
- (iv) all other correspondence and documents relating to this matter which are located in files maintained by the Defendant and its companies.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection any copying, as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered:

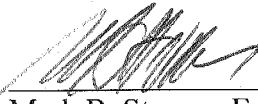
Defendant's damages are to be determined in an exact amount at trial.

D. For inspection and copying, under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

No such insurance agreement exists.

Dated: New York, New York
January 22, 2008

Respectfully submitted,
Mark B. Stumer & Associates, P.C.



Mark B. Stumer, Esq. (MBS-6027)
Attorney for Defendant
200 Park Avenue South, Suite 1511
New York, New York 10003
(212) 633-2225

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AFFIDAVIT OF SERVICE

JERRY L. WALLACE,

Defendant,


-----X
Shira Marshall, being duly sworn, deposes and says:

1. That I am not a party to the above entitled action; I am over the age of 18; and I am a legal assistance employed with the law firm of Mark B. Stumer & Associates, P.C..

2. That on the 23rd day of January 2008, I deposited a copy of the annexed DEFENDANT JERRY L. WALLACE'S INITIAL DISCLOSURES in the above entitled action, copies of which are annexed hereto, enclosed in a first class wrapper, with proper postage addressed to: Kenneth Rubinstein, Esq, Haynes and Boone, LLP, 153 East 53rd Street, Suite 4900, New York, New York 10022, in an official Postal deposit box located in the City of New York, State of New York under the exclusive care and custody of the United States Post Office Department.


Shira Marshall

Sworn to before me this 23rd day of
January, 2008;


Notary Public

MARK B. STUMER
Notary Public, State of New York
No. 02ST5044470
Qualified in New York County
Commission Expires May 30, 2011